

FILED
OCT 10 2017
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

Suntez, Pasley et. al
v.
LT. Crammer (superintendant) et. al

Case# 17-1085-JPG

Civil Rights Complaint

This civil rights Complaint is brought by the plaintiffs in regards to how their Constitutional rights are being violated by the defendants intentional and deliberate actions of operating a jail (per County Jail Standards) that does not provide adequate access to Library Services and legal material as it pertains to Section 430.20^(a) (Library Services and Legal Material), Section 430.40(b) (Photo Copying Services), and 701.230(c) (Library) and unreasonable living conditions pursuant to 42 U.S.C. 1983 and in good faith the plaintiffs asks this Court to Sustain this Complaint on all grounds Stated herein:

I. BACKGROUND

Plaintiffs are Subjected to inadequate access to living conditions and inadequate (1.) access to LAW LIBRARY

Inadequate portions of food, inadequate access to Cleaning Supplies to Clean ^{Rooms} Shower which is never cleaned because ~~inmate~~ plaintiffs are only allowed (1) one hour recreation which shower time is included, Camera placed over toilet in the cell (8x10) denying plaintiffs right to privacy, lights not being turned on until 11:00 am, plaintiffs being subjected to 23 hours confinement in a 8x10 cell, staff handling plaintiffs food (cooking handling and serving) without a food and sanitation license.

The Defendants et al, are aware and intentionally denying the plaintiffs all of the issues stated within the body of this civil complaint.

II. Parties

1.) Sunter Pasley is an inmate at the ALTON CITY JAIL at all times relevant to this civil matter and continues to be along with other said plaintiff

2.) Derek Marshall is an inmate at the ALTON CITY Jail at all times relevant to this civil matter and continues to be

3.) LT. CRAMMER is the Superintendent at the ALTON CITY JAIL at all times relevant to this civil matter

4) SGT. COLE is the Sergeant at the ALTON CITY JAIL at all times relevant to this civil matter

5) Officer Cook is an officer at the ALTON CITY JAIL at all times relevant to this Civil matter

6) Officer Philips is an officer at the ALTON CITY JAIL at all times relevant to this Civil Matter.

7) TAIWAN DAVIS is an inmate at the ALTON CITY JAIL at all times relevant to this Civil MATTER

8) OFFICER ROSS is an officer at the ALTON CITY JAIL at all times relevant to this civil matter.

9) OFFICER HAWKINS is an officer at the ALTON CITY JAIL at all times relevant to this civil matter

10.) Shawn BUCKLEY is an inmate at the ALTON CITY JAIL at all times relevant to this civil matter

10.) BRITT LACY is an inmate at the ALTON CITY JAIL at all times relevant to this civil matter

12.) OFFICER SNYDER is an officer at the ALTON CITY Jail at all times relevant to this civil matter

II. (A.) Parties Involved

The plaintiffs contend that they were personally involved in the unconstitutional acts imposed upon them by the defendants intentional actions of denying them the matters asserted in the "Statement of Facts". All of the defendants personally know about the Constitutional Violations, but did absolutely nothing to correct them.

III. Statement OF Facts

1.) The plaintiffs are subjected to inadequate access to legal material that assists defendants in legal matters as it pertains to defense in accordance with Title 20 ILLINOIS ADMINISTRATIVE CODE Section 430.20(a) 430.40 (b), and 701.230 (c) (See EXHIBITS A, B, & C) Defendants are aware of this constitutional violation and not doing anything to correct it.

2.) Plaintiffs are being subjected to living conditions equal to that of Segregation Status being that plaintiffs are placed in an 8x10 cell 23 hours a day with a **CAMERA** placed directly over the toilet depriving plaintiffs privacy even though there are 30 min. jail checks Defendants are aware of this constitutional violation and not doing anything to correct it.

3.) Plaintiffs are being fed inadequate portions of food daily, in that they are being fed a hostess cake of some sort for breakfast, Bologna Sandwich for lunch, and a Kids meal T.V dinner for dinner. Defendants are aware of this constitutional violation and not doing anything to correct it.

4.) Plaintiffs are being subjected to having their 1 hour Recreation (by Constitutional law) taken away for the most simplest reason such as asking an officer to pass a book being that we are locked in a 8x10 cell 23 hours a day. Defendants are aware of this Constitutional violation and not doing anything to correct it.

5.) Plaintiffs are being subjected to having their Shower time included within the recreation time therefore taking away from the hour that's allowed for recreation ~~as per~~ Constitutional rights. Defendants are aware of this Constitutional violation and not doing anything to correct it.

6.) Plaintiffs are being housed in a City Jail that's designed only for no more than a 48 hour stay. Defendants are ~~being subjected to~~ aware of this Constitutional violation and not doing anything to correct it.

7.) Plaintiffs are being housed per ~~disciplin~~ disciplinary institution and have not been disciplined and should not be subjected to such conditions as being confined to a 8x10 cell for 23 hours a day which could potentially have an enormous psychological impact to many if not all who are subjected to such conditions of confinement for a duration of time. Defendants are aware of this Constitutional violation and not doing anything to correct it.

8.) Plaintiffs are being subjected to unclean Shower area due to Alton City Jail Janitor not cleaning the Shower given the fact that his job description calls for it. Defendants are aware of these Constitution violations and not doing anything to correct it. (5)

6.) Plaintiffs are being subjected to officers cooking handling and serving their food without adequate training being that they are not in receipt of a food and sanitation license and Defendants are aware of this constitutional violation and not doing anything to correct it.

7.) Plaintiffs are being subjected to unjust and unfair Complaint decisions. That the grievances and complaints that are lobbied against officers ~~for~~ issues in particular are being decided ~~on~~ **ON** and resolved by any officer regardless of whether the grievance was written on said officer. Defendants are aware of this constitutional violation and not doing anything to correct it.

8.) Plaintiffs are being subjected to unjust and unfair treatment as those of highly extreme escape risks being that they are isolated from each other 24 hour a day (segregated) for non disciplinary reasons. Defendants are aware of this constitutional violation and not doing anything to correct it.

9.) Plaintiffs are being subjected to having officers administer medication daily without having been licensed as a medical technician. Defendants are aware of this constitutional violation and not doing anything to correct it.

10.) The Plaintiffs are subjected to total darkness from 12:00 am to 11:00 am along with cameras in the 8x10 cell, isolation 23 hours of lockdown and all other issues described in this complaint. Defendant are aware of these ~~the~~ constitutional violations and not doing anything to correct it.

11.) The plaintiffs are suing the defendants for Violating their 6TH, 8TH, and 14TH amendment rights under the United States Constitution, and the defendants are being Sued in their personal, official, and individual capacities for Violating plaintiffs Constitutional rights.

12.) That the plaintiffs tried to subside the Constitutional Violations Stated herein by Complaining to defendants in the proper manner of rendering grievances and complaints but the defendants deliberately and constantly ignored the issues by totally refusing to address and solve the matters to end the Constitutional Violations.

IV. Relief Sought

- 1.) Trial by jury on all triable issues
- 2.) order defendants to pay ~~\$500.000~~ **\$500,000** for Violating the Plaintiffs Constitutional Rights.
- 3.) order defendants to pay plaintiffs ~~\$1,500,000~~ **\$1,500,000** in punitive, compensational, and emotional damages for violating the plaintiffs Constitutional rights and grant declaratory Judgment.
- 4.) Grant plaintiffs an injunction against defendants to stop the Constitutional Violations Subjected to plaintiffs at this time and in the future.
- 5.) Grant an attorney to represent the plaintiffs for/in this Civil rights Complaint.
- 6.) Order defendants not to retaliate against plaintiffs for filing this Civil rights Complaint.

7.) Enter an order against defendants to correct all of the Constitutional violations mentioned in this Civil rights Complaint.

8.) Grant any and all manners respectfully deemed necessary by this Court to the plaintiffs.

9.) Enter an order deeming this facility unfit for long term holding of inmates being that this is a City Jail designed for 48 hours holds only.

x ~~Sunter Pasley~~ / ~~Sunter Pasley~~

x ~~Britt Lacey~~ / ~~Britt Lacey~~

x ~~Shawn Buckley~~ / ~~Shawn Buckley~~

x ~~Richard Turner~~ / ~~Richard Turner~~

x ~~Raymond Rush~~ / ~~Raymond Rush~~

x ~~[REDACTED]~~ / ~~[REDACTED]~~

x _____

x _____

x _____

x ~~[REDACTED]~~ / ~~[REDACTED]~~

x _____

x _____

x _____

Verifications

I have read the foregoing Complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct.

Executed at ALTON CITY JAIL
 1700 E. Broadway
 ALTON, IL. 62002 on October 4TH 2017

~~Simone D. Davis~~
 Brett V. Don

Shawn P. Buckley

Richard Turner

Raymond A. Rush

~~Debra L. Davis~~

Janice Davis

II(a) Amended Parties:

Richard TURNER is an inmate at the ALTON CITY JAIL at all times relevant to this civil matter and continues to be along with other said plaintiffs

Raymond RUSH is an inmate at the ALTON CITY JAIL at all times relevant to this civil matter and continues to be along with other said plaintiffs

NOTE: Said person is now within the F.B.O.P. System. Signature is that of said party and is authentic. I ~~very~~ verify under the penalty of perjury Shirley J. Pasley

Derek Marshall USM# 11563-025
F.B.O.P.

Shawn Buckley F.B.O.P. #10702-025

In Transition From Sentencing EPB (~~MAYBE~~) → Shawn Buckley Sentenced 5-24-17

Derek Marshall USM# 11563-025
F.B.O.P.

Shawn P. Buckley #10702-025

~~[REDACTED]~~

~~[REDACTED]~~

~~[REDACTED]~~

~~[REDACTED]~~

~~[REDACTED]~~

~~[REDACTED]~~

Sunder D. Sholey
1100 E. Broadway
Alton, IL 62002

LEGAL MAIL

RECEIVED

OCT 10 2017

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